

## UNITED STATES DISTRICT COURT

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## DISTRICT OF OREGON

Eugene DIVISION

Muhsin Sharif

(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. Co: 21-CV-310-HZ  
(to be assigned by Clerk's Office)COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS (PRISONER COMPLAINT)City of EugeneEugene Police Dept.Officer's Bo Rankin / Ryan Trullinger

(Enter full name of ALL defendant(s))

Jury Trial Demanded

☒ Yes☐ No

Defendant(s).

## I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

## Plaintiff

Name: Muhsin Sharif  
Street Address: 101 W. 5th St  
City, State & Zip Code: Eugene, OR 97401  
Telephone No.: (570) 237-1050

Complaint for Violation of Civil Rights (Prisoner Complaint)

[Rev. 01/2018]

**Defendant No. 1** Name: Eugene Police Dept.  
 Street Address: 300 country club rd  
 City, State & Zip Code: Eugene, OR 97401  
 Telephone No.: \_\_\_\_\_

**Defendant No. 2** Name: Officer Ryan Trullinger  
 Street Address: 300 country club rd  
 City, State & Zip Code: Eugene, OR 97401  
 Telephone No.: \_\_\_\_\_

**Defendant No. 3** Name: Officer Bo Rankin  
 Street Address: 300 Country club rd  
 City, State & Zip Code: Eugene, OR 97401  
 Telephone No.: \_\_\_\_\_

**Defendant No. 4** Name: City of Eugene  
 Street Address: \_\_\_\_\_  
 City, State & Zip Code: \_\_\_\_\_  
 Telephone No.: \_\_\_\_\_

## II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

Civil Rights and Excessive use of force

### III. STATEMENT OF CLAIMS

#### Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

On 11 30 20 while I was suffering a mental health crisis, Officers from the eugene police dept fired 8 rounds at me. Two of those rounds struck me, one in my shoulder which severed my brachial artery and another in my hip breaking my femur. Afterwards while I was on the ground pleading for help they tazed me in my back.

#### Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

On 11-30-20 while I was suffering a health crisis Officer Ryan Trullinger fired 4 of the

8 rounds which were aimed at me.

### Claim III

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

On 11-30-20 while I was suffering a mental health crisis officer Bo Rankin fired the other 4 of the 8 rounds that were aimed at me. Afterwards while I was on the ground critically bleeding from the gunshot wounds which he and officer Trellinger inflicted he tazed me in my back.

*(If you have additional claims, describe them on another piece of paper, using the same outline.)*

#### IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☒ No

#### V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

I am seeking 5 million dollars for punitive damages, Pain and Suffering and to cover the cost of all future medical expenses including follow up appointments medication and Physical therapy.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24 day of February, 2021.

Muhsin Sharif  
(Signature of Plaintiff)